3/20/07 BdWrshp Item 8
Water Recycling
Deadline: 3/27/07 5 pm

West Basin Municipal Water District
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March 26, 2007

Ms. Tam M. Dudoc P.E., Chair
State Water Resources Control Board
1001 'I' Street
PO Box 100
Sacramento, CA 95812

RE: COMMENTS TO THE STATEWIDE WATER RECYCLING POLICY

Dear Ms. Dudoc:

West Basin Municipal Water District (West Basin) appreciates the opportunity to express our support of a statewide Water Recycling Policy. As a public agency responsible for supplying drinking water to nearly a million people in Los Angeles County, West Basin's interests are best served by protecting water quality. West Basin further understands that depending on one source of water is a risk to the region's water supply reliability should something happen to that supply. Therefore, West Basin has carefully diversified its water portfolio over the past decade and is proud of its water recycling efforts to meet the needs of the people, industry and environment.

Advancing water recycling, however, has not been an easy task. West Basin was happy to share its experiences in the record at your March 20, 2007 workshop on this policy. Our comments are reiterated in a brief summary below for your consideration when drafting this statewide recycled water policy:

Benefit to the State – It is clear that recycled water provides an 'untapped' source of water to communities. The few concerns seem to revolve around potential for elevated constituents such as chlorides. The anti-degradation policy of 1968 states that 'some degradation' is justified if a greater benefit to the state is derived. When looking at the cost of moving more water across this state hundreds of miles, the conclusion seems clear. Costs of energy to move water, costs to wildlife when loosing habitat to water diversions, and the expanded carbon foot print by using so much energy to move water surely will not outweigh slight elevations in particular constituents

to groundwater so long as the beneficial uses are always accounted for. A state wide policy should take into consideration these costs and benefits for a fair evaluation.

Separate the Recycled Water Use Types – West Basin provides 5 different types of recycled water to the community ranging from irrigation and industrial uses to groundwater injection as protection from seawater intrusion. These different uses not only have different treatment processes, but also have different vulnerabilities and should be evaluated carefully based on their risk. Recycled water that can water turf at a golf course, which would otherwise use large amounts of drinking water to water grass, does not need the same considerations as water injected into groundwater aquifers. We cannot be good stewards of the public's resources if unnecessary and costly treatment and monitoring is required to water turf. A good recycled water policy should clearly define these different categories of uses (as the Department of Health Services already does) and look at the best and most practical treatments for each use. Furthermore, general permits could be developed saving all agencies and regulators time and money, while allowing concentrated efforts to focus on the evaluation of other less traditional uses of recycled water.

Consistent Regulations – The state task force on recycled water repeatedly stated that all agencies were to "encourage" the use of recycled water where possible. Unfortunately, many regulations and policies discourage this. Anti-degradation, as mentioned above, has never been used to evaluate the greater good of recycled water, but instead has been interpreted simply to mean that no degradation of background levels may occur, EVEN IF Basin Plans allow higher levels. This does not encourage recycled water. The 'one molecule' rule, as it is often referred to, gives many users apprehension about utilizing recycled water for fear of one molecule of a constituent reaching a body of water. For example, the Chevron Refinery in El Segundo California has a de-designated aquifer under their facility where they pump millions of gallons of potable drinking water into this aquifer to create a hydraulic barrier, and then pump this water back out of the aquifer to treat constituents in the aquifer. Recycled water would be the most economical and practical water to use for this activity in a de-designated aquifer, however the company is reluctant to use recycled water because regulators told them that should a molecule of a constituent above the Ocean Plan limit travel past the barrier and reach the ocean, they would be liable for seawater remediation. This is not a sensible solution. A smart recycled water policy should again address cost benefit evaluation of beneficial uses despite contradicting regulations and policies.

Close the Loop – The policy needs to look at ALL permits necessary to make recycled water more accessible to potential users. For example, if a recycled water permit is issued, but the accompanying brine permit or flushing permit is excessively prohibitive it is not encouraging use of recycled water.

A well written statewide recycled water policy will help encourage environmentally safe use of recycled water. Without it, inconsistent interpretation by various parties will continue to unnecessarily drive up the cost of permits and make recycling cost prohibitive except for the 'big

players' in the industry. West Basin already spends over half a million dollars a year on monitoring for recycled permits and believes this information could be used wisely to create a better data base for ensured water quality. West Basin looks forward participating with other agencies, environmental leaders and regulators on studies and benefit analysis programs which will help this state become a leader in water resource management.

Feel free to contact myself at (310) 660 – 6210 or Uzi Daniel at 310 660-6245 for any further information. Your assistance and that of your staff is always greatly appreciated.

Sincerely,

Rich Nagel
General Manager
West Basin MWD

Cc: Paul Shoenberger
Wyatt Won
Uzi Daniel